

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS--EASTERN DIVISION**

U.S. Bank National Association,	)	
	)	
Plaintiff/Judgment Creditor,	)	
-vs-	)	15C-6732
Estate Planning Consultants, Inc.,	)	
	)	
Defendant/Judgment Debtor,	)	Judge John Z. Lee
and	)	
Old Second National Bank,	)	
Third-Party Citation Respondent.	)	

**MOTION FOR JUDGMENT**

NOW COMES the Plaintiff/Judgment Creditor, U.S. Bank National Association, by and through its attorneys, TELLER, LEVIT & SILVERTRUST, P.C., and moves this Court to enter a Judgment on the Answer the Third Party Citation Respondent, and in support of its Motion as follows:

1. A Third Party Citation to Discover assets was issued in this cause by the Clerk of the Court on March 16, 2016.

2. The Third Party Citation Respondent, Old Second National Bank, was served on March 22, 2016, with the Citation to Discover Assets returnable April 14, 2016. A copy of the Citation and Return of Service is attached hereto as Plaintiff's Group Exhibit "1".

3. The Third Party Citation Respondent subsequently sent to Plaintiff's attorneys a copy of its Answer to the Citation to Discover Assets. A copy of said Answer is attached hereto and made a part hereof as Plaintiff's Group "1".

4. The Third Party Citation Respondent has answered the Citation to Discover Assets by stating it is holding the sum of \$362.75, subject to the lien of the Citation.

5. The Plaintiff/Judgment Creditor accepts the Respondent's written answer in lieu of the personal appearance of the Respondent in court on the return date of the Citation.


WHEREFORE, the Judgment Creditor prays that this Court:

A. Enter a Judgment against the Third Party Citation Respondent in the amount of \$362.75, in favor of the Defendant /Judgment Debtor Estate Planning Consultants, Inc., for the use of Plaintiff/Judgment Creditor, and that the Third Party Citation Respondent be ordered to turn over to Plaintiff/Judgment Creditor's attorneys the funds it is currently holding pursuant to the lien of the Citation.

B. That Pursuant to the provisions of 735 ILCS 5/2-1402, a continuing lien be imposed upon any other monies which may become due to the Defendant/Judgment Debtor, Estate Planning Consultants, Inc., effective March 22, 2016, the date of service of the Third Party Citation upon the Respondent.

C. That the Old Second National Bank, be ordered to remit to Plaintiff's attorneys', at least once a month, any monies which become due the Judgment Debtor until further order of Court, which monies shall be applied by Plaintiff's counsel to reduce the remaining judgment indebtedness.

**U.S. BANK NATIONAL ASSOCIATION**  
Plaintiff/Judgment Creditor

By:   
Kevin E. Posen  
One of its attorneys

TELLER, LEVIT & SILVERTRUST, P.C.  
Attorneys for Plaintiff  
19 South LaSalle Street, Suite 701  
Chicago, Illinois 60603  
(312) 922-3030 – Attorney ID# 6203687